

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

FAVION HARRIS (1)
a/k/a "DaiDai"
JA'LAE DACOI WILSON (2)

NO. **5-23CR-097-H**

SEP 13 2023 PM 12:58
FILED - USDC - NDTX - LU

INDICTMENT

The Grand Jury Charges:

Count One

Convicted Felon in Possession of Firearms
(Violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8))

From on or about January 15, 2023, to on or about the date of this indictment, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Favion Harris**, also known as "DaiDai", defendant, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce firearms, to wit: a Glock, model 22, .40 caliber semiautomatic pistol, serial number BVKZ874, and a Glock, model 19X, 9 millimeter semiautomatic pistol, serial number BWZH589.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8).

Count Two

False Material Statement During the Purchase of a Firearm
(Violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2))

On or about January 15, 2023, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Ja'Lae Dacoi Wilson**, defendant, in connection with the acquisition and attempted acquisition of a firearm, that is, a Glock, model 22, .40 caliber semiautomatic pistol, serial number BVKZ874, from Lone Star Shooting Sports, 6020 43rd Street, Lubbock, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to Lone Star Shooting Sports, which statement was intended and likely to deceive Lone Star Shooting Sports, as to a fact material to the lawfulness of such sale and acquisition of said firearm under chapter 44 of Title 18, in that defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction Record to the effect she was the actual transferee and buyer of the firearm, when she was knowingly and intentionally acquiring the firearm on behalf of another person, to wit: Favion Harris, also known as "DaiDai."

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count Three

False Material Statement During the Purchase of a Firearm
(Violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2))

On or about February 22, 2023, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Ja'Lae Dacoi Wilson**, defendant, in connection with the acquisition and attempted acquisition of a firearm, that is, a Glock, model 19X, 9 millimeter semiautomatic pistol, serial number BWZH589, from Lone Star Shooting Sports, 6020 43rd Street, Lubbock, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to Lone Star Shooting Sports, which statement was intended and likely to deceive Lone Star Shooting Sports, as to a fact material to the lawfulness of such sale and acquisition of said firearm under chapter 44 of Title 18, in that defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction Record to the effect she was the actual transferee and buyer of the firearm, when she was knowingly and intentionally acquiring the firearm on behalf of another person, to wit: Favion Harris, also known as "DaiDai."

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

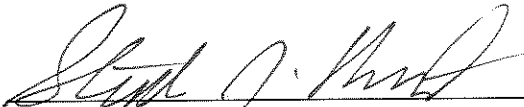
Upon conviction of any of the offenses alleged in this indictment, and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendants **Favion Harris**, also known as “DaiDai,” and **Ja’Lae Dacoi Wilson**, shall forfeit to the United States of America any firearm and ammunition involved in or used in the knowing commission of the offense, including, but not limited to, a Glock, model 22, .40 caliber semiautomatic pistol, serial number BVKZ874, and a Glock, model 19X, 9 millimeter semiautomatic pistol, serial number BWZH589, and any additional ammunition, magazines, and / or accessories recovered with the firearms.

A TRUE BILL:



FOREPERSON

LEIGHA SIMONTON
UNITED STATES ATTORNEY



STEPHEN J. RANCOURT

Assistant United States Attorney
Texas State Bar No. 24079181
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401
Telephone: 806-472-7398
Facsimile: 806-472-7394
E-mail: stephen.rancourt@usdoj.gov

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FAVION HARRIS (1)
a/k/a "DaiDai"
JA'LAE DACOI WILSON (2)

INDICTMENT

COUNT 1: CONVICTED FELON IN POSSESSION OF FIREARMS
Title 18, United States Code, Sections 922(g)(1), 924(a)(8).
COUNT 2: FALSE MATERIAL STATEMENT DURING THE
PURCHASE OF A FIREARM
Title 18, United States Code, Sections 922(a)(6), 924(a)(2).
COUNT 3: FALSE MATERIAL STATEMENT DURING THE
PURCHASE OF A FIREARM
Title 18, United States Code, Sections 922(a)(6), 924(a)(2).
FORFEITURE NOTICE
(3 COUNTS + FORFEITURE NOTICE)

A true bill rendered:
Lubbock



Foreperson

Filed in open court this 13th day of September, A.D. 2023.
ARREST WARRANT TO ISSUE AS TO EACH DEFENDANT



UNITED STATES MAGISTRATE JUDGE